

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

WILLIAM M. BULGER, JR.,)
Administrator of the Estate of)
James Bulger,)
Plaintiff,) CIVIL ACTION NO. 3:20-cv-206
)
v.) JUDGE JOHN PRESTON BAILEY
)
) (*Electronically Filed*)
HUGH HURWITZ, *et al.*)
)
Defendants.)

**THE INDIVIDUAL DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S CLAIMS
AGAINST THEM**

NOW COME Defendants Hugh J. Hurwitz, J.A. Keller, Angela Dunbar, R.C. Cheatham, Charles Lockett, Joseph Coakley, Amy Ruiz, Jeffrey Smith, Alice Pisaneschi, Anthony Mori, Jeremy Shirk, and Brandon Boledovic (the "Individual Defendants"), by and through their undersigned Counsel, and respectfully move this Court, under Rule 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Plaintiff William M. Bulger, Jr.'s claims against them in the Second Amended Complaint, ECF No. 24, with prejudice. The Individual Defendants' Motion is based on the law and arguments contained in the accompanying Memorandum in Support, which is incorporated herein by reference.

WHEREFORE, for the reasons set forth in the Individual Defendants' accompanying Memorandum in Support, the Individual Defendants respectfully request that the Court grant the instant Motion and dismiss Plaintiff's claims against them with prejudice.

Dated: October 22, 2021

Respectfully submitted,

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/s/ Daniel C. Luecke
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2021, a true and correct copy of the Individual Defendants' Motion to Dismiss Plaintiff's Claims Against Them was served by ECF upon all counsel of record.

/s/ Erin K. Reisenweber
Erin K. Reisenweber
Assistant U.S. Attorney